REMARKS

Claims 1 – 22 remain in the application and stand rejected. Claim 19 is amended herein, Although this Response is being timely filed, the Commissioner is hereby authorized to charge any fees that may be required for this paper or credit any overpayment to Deposit Account No. 19-2179.

Claim 19 is amended herein to better recite the invention and, more particularly, recite what is occurring in step (d) of claim 1 with more specificity. This amendment to claim 19 is supported by the specification and in particular, step (d) of Claim 1. No new matter is added. No reference of record teaches or suggests replacing browser messaging plug-ins with messaging redirector plug-ins and assigning each to the same selected port as the plug-in it is replacing as claim 19 (or claim 1) recites. Independent consideration and allowance of claim 19, as amended, is respectfully requested.

Claims 1 – 5 and 10 – 14 are rejected as being unpatentable under 35 U.S.C. §103(a) over newly cited published U.S. Patent Application No. 2004/0029598 to Guggisberg in view of U.S. Patent No. 6,212,535 to Weikart et al. Claims 6 – 9 and 15 – 22 are rejected under 35 U.S.C. §103(a) over Guggisberg and Weikart et al. in further combination with U.S. Patent No. 6,359,892 to Szlam. The rejection is respectfully traversed.

Regarding claim 1 (and 10), the Office action asserts that Guggisberg teaches "...c) providing **the computer workstation which supports messaging plug-ins**, each of said messaging plug-ins being assigned a selected port (the workstation is connected to a network and receives and sends messages; paragraph 0049, 0053); ..." (emphasis added). It is respectfully submitted that claim 1 actually recites "c) providing the computer workstation **with a browser program** which supports messaging plug-ins, each of said messaging plug-ins being assigned a selected port;" which is different than what the Office action asserts is taught by Guggisberg. The Office action acknowledges, however, that Guggisberg fails to teach step (d) of "providing messaging redirector plug-ins for the browser program ... ."

Thus, it is asserted that "Weikart teaches a brower program and providing **messaging redirector plug-ins for the browser program which each replace a corresponding messaging plug-in ...**" at column 3, lines 6 – 63 (emphasis added). So, it is asserted that "[i]t would have been obvious ... to combine the browser plug-in of Weikart with the **plug in of Guggisberg**. A person of ordinary skill in the art would have been motivated to do this to facilitate messaging between devices that support two different formats." (emphasis added).

As previously noted, Guggisberg teaches "a method for transmitting short messages between computers in the Internet." *See; e.g.*, paragraph 0001, lines 1 – 3. It is key to Guggisberg that "communication between the computers 3 and 8 is effected via the ISMTP protocol (Internet Short Message Transfer Protocol)... ." Paragraph 0050, lines 5 – 8. Thus, communications are conducted using the "inventive ISMTP protocol" as Guggisberg clearly indicates throughout. *See, e.g.*, paragraph 0051, lines 2 – 3 and paragraph 0052, lines 1 – 4. Paragraph 0053 in particular provides "an example is given in which a computer R1 sends a short message by means of the **inventive protocol** ISMTP to a computer R2." *Id*, lines 1 – 3 (emphasis added). This is followed by a corresponding example (to the description of paragraph 0053) in more detail in paragraphs 0054 – 66. Thus, while Guggisberg teaches "communication between the computers 3 and 8" using the "inventive ISMTP protocol," Guggisberg does not teach plug-ins in a browser in either of the computers 3 or 8 forwarding SMS messages, e-mails or other types of messages to the remote phones 1, 2. Therefore, as previously noted, Guggisberg neither mentions nor suggests using a browser, much less browser plug-ins.

Weikart et al. teaches a "web page 200 [that] includes an embedded HTML tag 210. The tag 210 specifies parameters for a 'browser extension.' A browser extension is a program which extends the capabilities of the browser application program 101." Col. 3, lines 25 – 28. "[T] he extension can be a 'plug-in,' or an 'applet.' A plug-in extension is a hardware/software platform-specific program written in native executable code. A plug-in can essentially do anything the browser can do." *Id,* lines 35 – 39. "FIG. 2 generally shows the form of a tag 210 specifying a browser extension in the form of a plug-in." *Id,* lines 47 – 48. Further,"field 223 specifies a default e-mail address which is to receive messages generated **by the extension**. The field 224 specifies the location **where the extension is stored**." *Id,* lines 55 – 58 (emphasis added). Thus,

Weikart et al. teaches a browser with stored plug-ins that generate messages and forward the plug-in messages to a designated e-mail address. This hardly teaches "messaging redirector plug-ins ... [that] each replace a corresponding messaging plug-in," e.g., replacing a Weikart et al. plug-in.

So, while combining Weikart et al. with Guggisberg may result in "c) providing the computer workstation with a browser program which supports messaging plug-ins, each of said messaging plug-ins being assigned a selected port...;" this combination hardly results in the present invention as claimed in claim 1. Without Guggisberg teaching a browser, much less a plug-in, one cannot "combine the browser plug-in of Weikart with the [non-exisitant] plug in of Guggisberg." Furthermore, the allegedly obvious combination of Guggisberg with Weikart et al. as suggested in the Office action, would obviate the need for a key feature of Guggisberg, i.e., the "inventive ISMTP protocol;" and is, therefore, an attempted modification of Guggisberg that is unwarrented by its disclosure and is respectfully submitted as being improper.

Accordingly, because Guggisberg fails to teach "c) providing **the computer workstation with a browser program which supports messaging plug-ins**, each of said messaging plug-ins being assigned a selected port;" and because Weikart et al. fails to teach "messaging redirector plug-ins ... [that] each replace a corresponding messaging plug-in;" the combination of Weikart et al. with Guggisberg does not result in the present invention as recited in claims 1 and 10. Therefore, *prima facie* obviousness of the present invention over the combination of Weikart et al. with Guggisberg has not been established under 35 U.S.C. §103(a). Further, even if Weikart et al. in combination with Guggisberg were to result to result in the present invention as recited in claims 1 and 10, the combination is still non-obvious because it requires a modification of Guggisberg that is unwarranted by the disclosure of either reference. Therefore, reconsideration and withdrawal of the rejection of claims 1 and 10 over Guggisberg in combination with Weikart et al. under 35 U.S.C. §103(a) is respectfully requested.

Furthermore, because dependent claims include all of the differences with the prior art as the claims from which they depend, claims 2 – 5 and 11 – 14, which depend from claims 1 and 10, respectively, are not made obvious by the combination of Weikart et al. with Guggisberg.

Reconsideration and withdrawal of the rejection of claims 2 – 5 and 11 – 14 over Guggisberg in combination with Weikart et al. under 35 U.S.C. §103(a) is respectfully requested.

Regarding the rejection of claims 6 – 9 and 15 – 22 under 35 U.S.C. §103(a), again, Szlam is cited, solely for teaching a PBX network. Further, it is asserted that "it would have been obvious ... to combine the telephone network of Guggisberg and Weikart with the PBX network of Szlam. A person of ordinary skill in the art would have been motivated to do this to allow the user to make long distance phone calls." However, Szlam fails to cure the above identified shortcomings of the combination of Guggisberg with Weikart et al. Adding a PBX to Guggisberg and Weikart et al. still fails to teach "messaging redirector plug-ins ... [that] each replace a corresponding messaging plug-in." Thus, the combination of Guggisberg and Weikart et al. with Szlam, still falls short of resulting in the present invention as recited in claims 1 and 10. Therefore, claims 6 – 9 and 15 – 22, which also depend from claims 1 and 10, respectively, are not made obvious by the combination of Weikart et al. and Guggisberg with Szlam. Reconsideration and withdrawal of the rejection of claims 6 – 9 and 15 – 22 over Guggisberg and Weikart et al. in further combination with Szlam under 35 U.S.C. §103(a) is respectfully requested.

The applicants thank the Examiner for efforts, both past and present, in examining the application. Believing the application to be in condition for allowance for the reasons set forth above, the applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1 – 22 under 35 U.S.C. § 103(a) and allow the application to issue.

The applicants note that MPEP §706 "Rejection of Claims," subsection III, "PATENTABLE SUBJECT MATTER DISCLOSED BUT NOT CLAIMED" provides in pertinent part that

> If **the examiner** is satisfied after the search has been completed that patentable subject matter has been **disclosed** and the record indicates that the applicant intends to claim such subject matter, he or she **may note** in the Office action that **certain aspects or features** of the patentable invention have not been claimed and that if properly claimed such claims **may be given favorable consideration**. (emphasis added.)

The applicants believe that the written description of the present application is quite different than, and not suggested by, any reference of record. Accordingly, should the Examiner believe anything further may be required, the Examiner is requested to contact the undersigned attorney at the local telephone number listed below for <u>a telephonic or personal interview</u> to discuss any other changes.

Respectfully submitted,

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(Date)

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